

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

ANDREW J. BRIGIDA, *et al.*,

*Plaintiff Class,*

vs.

No. 16-cv-2227 (DLF)

SEAN DUFFY, Secretary, U.S. Department of  
Transportation,

*Defendant.*

**JOINT MOTION FOR STAY OF LITIGATION TO PURSUE MEDIATION**

Plaintiffs Andrew J. Brigida, Matthew L. Douglas-Cook, and the certified Class (together, “Plaintiffs”) and Defendant Sean Duffy, in his official capacity as Secretary of Transportation (“Defendant” or the “FAA”) respectfully submit this joint motion for a stay of all pending deadlines (except the deadline for Defendant’s expert disclosures) for 60 days so that the parties can pursue a non-judicial resolution of this matter.

There is good cause for the Court to grant this motion. In a Minute Order entered on March 14, 2025, the Court extended all pending deadlines by two weeks, including the remaining deadlines for expert discovery. The parties jointly plan to pursue mediation through the Court’s Mediation Program, and pausing most of the remaining deadlines in this case would facilitate exploration of a non-judicial resolution.<sup>1</sup> Making room for mediation in this way would serve judicial economy and would also reduce the parties’ expenditure of time and other resources on litigation steps that would

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<sup>1</sup> Plaintiffs believe that, because Defendant has had the benefit of Plaintiffs’ expert disclosures since January 21, 2025, Defendant should serve its expert disclosures in advance of any mediation session. However, in order to facilitate Defendant’s internal review of those disclosures, and because Defendant’s expert will be traveling during the week of March 31, the parties have agreed to a further two-week extension, until April 14, of the deadline for Defendant’s expert disclosures.

be unnecessary if a non-judicial resolution could be achieved.

For the foregoing reasons, the parties therefore respectfully request that the Court (1) extend the deadline for Defendant's expert disclosures by two additional weeks, until April 14, 2025, (2) otherwise stay this case for 60 days so that the parties may pursue mediation, (3) refer this case to the Court's Mediation Program, and (4) set a Joint Status Report to be due on May 30, 2025, regarding whether the stay should be extended or expire.

Dated: March 26, 2025

Respectfully submitted,

/s/ David H. Thompson (by permission)

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/s/ Galen N. Thorp

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served by e-mail on counsel for Defendant on March 26, 2025.

/s/ Galen N. Thorp  
Galen N. Thorp

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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ANDREW J. BRIGIDA, et al.,	)	
	)	
Plaintiff Class,	)	
	)	
v.	)	Civil Action No. 16-cv-2227 (DLF)
	)	
SEAN DUFFY, Secretary, U.S.	)	
Department of Transportation,	)	
	)	
Defendant.	)	
_____	)	

**[PROPOSED] ORDER**

Upon consideration of the parties’ Joint Motion For Stay of Litigation to Pursue Mediation, and good cause being shown, it is hereby:

**ORDERED** that the Joint Motion is GRANTED; and further

**ORDERED** that the defendant’s expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2) are due on or before April 14, 2025; and further

**ORDERED** that the case is otherwise stayed for 60 days; and further

**ORDERED** that the case is referred to this Court’s Mediation Program; and further

**ORDERED** that the parties shall file a Joint Status Report on or before May 30, 2025 regarding whether the stay should be extended.

**SO ORDERED.**

DATED: \_\_\_\_\_, 2025

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UNITED STATES DISTRICT JUDGE